

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

KEY MANAGEMENT PARTNERS, INC.,

Defendant.

Case No. 8:21-CV-02496-PX

EEOC’S MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT

Plaintiff U.S. Equal Employment Opportunity Commission (“EEOC”) moves for entry of default judgment against Defendant Key Management Partners, Inc. (“Defendant”) pursuant to Fed. R. Civ. P. 55(b)(2). EEOC filed this action on September 29, 2021, alleging sex harassment and retaliation against Defendant under Title VII of the Civil Right Act of 1964. Following its Answer, and over the course of nearly eight months, Defendant failed to meaningfully participate in discovery, failed to communicate with its counsel Ms. Dionna Lewis—who has now withdrawn because of Defendant’s refusals to participate in the litigation of this action or its own defense, and ignored an order of this Court setting a deadline of November 28, 2022 for Defendant to obtain new counsel as required under Local Rule 101.1(a) subject to entry of default judgment. EEOC now moves for entry of default judgment as to liability on all claims against Defendant in this matter.

Recently, upon EEOC’s Motion, the Clerk entered default against Defendant on January 17, 2023, and served on Defendant. *See* ECF Nos. 21, 22. EEOC acknowledges that the thirty-day period for Defendant to move this Court to set aside the default has not yet expired, but files

this Motion presently to satisfy the Court's January 20, 2023 dispositive motions deadline. *See* ECF Nos. 16, 19. EEOC does not oppose the Court deferring resolution of this Motion until the expiration of the thirty-day period on February 16, 2023. With respect to damages, EEOC will proceed as prescribed by this Court, and will establish its entitlement to damages through briefing, documentary sources and declarations, and/or if the Court prefers, at a hearing.

Based on the foregoing, and the arguments in EEOC's Brief in Support of this Motion which are incorporated herein, entry of default judgment on liability against Defendant is warranted. EEOC respectfully moves this Court to enter default judgment against Defendant as to liability for all claims in this matter, and to establish a process for briefing and/or a hearing to determine the appropriate damages to be awarded, both monetary and injunctive.

Dated: January 19, 2023

Respectfully Submitted,

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

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